



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
KNOXVILLE ENVIRONMENTAL FIELD OFFICE

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March 3, 2010

Certified Mail
Return Receipt Requested
7007 2680 0001 3242 1044

Keith Horvath, Facility Manager
Vacumet Corp.
Metalized Paper Division
5705 Commerce Blvd
Morristown, TN 37814

RE: Air pollution control violations confirmed during the 2010 Semi-annual Reporting Review at Vacumet Corporation, Metalized Paper Division in Morristown, Tennessee
File No. 32-0169

NOTICE OF VIOLATION

Dear Mr. Horvath:

On October 19, 2009 the Division has received your semi-annual report for the period from April 1, 2009 to September 30, 2009. In the submittal you reported a deviation of your permitted limit for VOC content. Specifically, your average value for monthly pounds of volatile organic compounds per gallon of coating (lbs of VOC/gal of coating) in August 2009 was 3.37 lbs of VOC/gal of coating. Title V Operating Permit 559215 issued to your company for this facility on August 5, 2009 specifies the following in Conditions E5-2:

VOC content shall not exceed 2.9 pounds per gallon of coating, excluding water and/or exempt compounds, as applied on a monthly weighted average basis.

Therefore this is a violation of Condition E5-2. Based on the findings of the Semi-annual reporting review you are in violation of Division Rule 1200-3-9-.02(6). This rule states in pertinent part:

"(6) Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating permit, all provisions of these regulations, and all provisions of the Tennessee Air Quality Act."

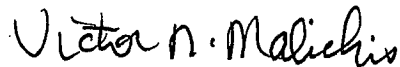
The Tennessee Air Quality Act allows for enforcement action against persons who violate the Act or its Regulations. Your company should consider this letter as your formal Notice of Violation. A copy of this Notice of Violation is being sent to the Division's Enforcement Section in

The Tennessee Air Quality Act allows for enforcement action against persons who violate the Act or its Regulations. Your company should consider this letter as your formal Notice of Violation. A copy of this Notice of Violation is being sent to the Division's Enforcement Section in Nashville for review and further enforcement action and/or penalties, if deemed necessary. You will be notified of any further enforcement action.

You are being presented with an opportunity to show cause why additional enforcement action should not be taken. The noncompliance described in this Notice of Violation will be evaluated to determine if additional enforcement action is necessary. If you have any information that proves the allegation of noncompliance is unwarranted, or if you have information those documents mitigating circumstances relative to the noncompliance, you may submit that information in writing to the Technical Secretary, 9th Floor L & C Annex, 401 Church Street, Nashville, Tennessee 37243-1531. Your written response must be submitted within 20 days of the receipt of this Notice of Violation.

The Division will also acknowledge your additional information prior to finalizing any enforcement action. If the Division determines that a civil penalty, damages assessment or corrective action schedule is needed, a Technical Secretary's Order will be issued. Technical inquiries surrounding this allegation of noncompliance should be directed to Richard Smrz at (865) 594-5567, or Sunanda Shajikumar at (615) 532-6823. Questions concerning the enforcement process should be directed to Tammy Medlen at (615) 532-0531.

Sincerely,



Victor N. Malichis
Environmental Field Office Manager
Division of Air Pollution Control

VNM: ras 20100304

cc: NCO company file, Nashville,
NCO Enforcement Section, Nashville,
KEFO company file 32-0169
KEFO Reading file,
Env Spec's file: NOV32-0169.20100304
NOV32-0169.20100304

SECTION 2

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION DIVISION OF AIR POLLUTION CONTROL

MEMORANDUM

DATE: March 3, 2010
TO: File (32-0169-G9)
FROM: RAS
SUBJECT: Summary Evaluation Report
Vacumet Corporation, Metalized Paper Division (32-0169)
Report Name: Semiannual Report
Report Period: April 1, 2009 to September 30, 2009

Location: 5705 Commerce Blvd, Morristown, TN 37814

Facility Contact (Name, Phone Number): Keith Horvath (423-585-3152)

Title V Permit number: 559215

Part 1: Notice of Violation

Semi-annual Report reported non-compliance.

The report contained calculations which demonstrated a violation of the company's VOC content limit.

Violation:

Condition E5-2 of Title V permit (which contains the reference to 1200-3-18-.14(3)(b))
Rule 1200-3-9-.02(6)

Part 2: Rest of the report

Listing of comments/observations to support adequacy determination.

- (1). The report is certified by the responsible official.
- (2). Deviations have been reported as required.
- (3). Records are in the format as required by the permit.
- (4). The report was submitted before the deadline.
- (5). The report contained all required records, so it was complete.
- (6). The company has submitted a timely deviation report, which detailed corrective actions instituted to avoid the cause of the violation in the future. The company returned to compliance in the following month.